

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUN 13 2011 *ack*
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MICHAEL W. DOBBINS
CLERK, U. S. DISTRICT COURT

Ronald Harris,

Plaintiff,

v.

Thomas J. Dart, et al.,
Defendants.

Case no. 10 C6666

Judge: John W. Darrah
Magistrate Judge: Morton
Denlow

Affidavit In Support of Plaintiff's Motion
For The Appointment of Counsel

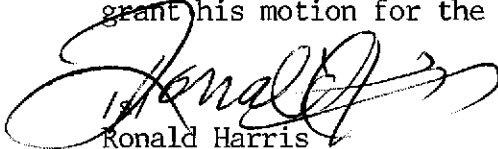
I, Ronald Harris, being duly sworn, deposes and says:

1. That I am the Plaintiff in the above entitled case,
I make this affidavit in support of my motion for the
appointment of counsel.

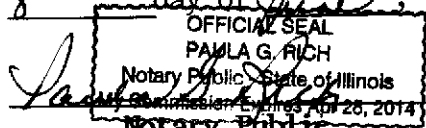
2. The complaint in this case alleges that the defendants
Cook County Sheriff Thomas J. Dart, Executive Director of
the Cook County Jail Salvador Godinez, Cook County Correctional
Officer Captain Chester Plexico, and Correctional Officer
Martieri failed to Protect him from violence by other inmates
while he was detained at the Cook County Jail, not limited
to knowingly placing him in a dangerous situation, and with
regard to one defendant, helped to facilitate the violence
against him. The Plaintiff also alleges that this violence
is part of a policy or custom of violence occurring at the
Cook County Jail and that the supervisory defendants have
knowingly turned a blind eye ignoring the violence.

3. This is a complex case because it contain several different legal claims, with each claim involving a different set of defendants.
4. The Plaintiff has demanded a jury trial.
5. The case will require discovery of documents and depositions of a number of witnesses.
6. The Plaintiff believe that the testimony will be in sharp conflict, since the Plaintiff alleges that at least one of the defendants watched, motivated, and allowed the assaults on the Plaintiff to take place.
7. The Plaintiff has no high school education and has no legal education.
8. Plaintiff is currently in Protective Custody Status, for this reason he has very limited access to legal materials and has no ability to investigate the facts in or of the case, for example, by locating and interviewing witnesses who were eyewitnesses to the assaults and the conditions that the Plaintiff was subject to.
9. As set forth in the Plaintiff's Memorandum of Law submitted with his motion for the appointment of counsel and affidavit, these facts, along with the legal merits of the Plaintiff's claims, support the appointment of counsel to represent him.

WHEREFORE, the Plaintiff prays that this Honorable Court grant his motion for the appointment of counsel in this case.


Ronald Harris
Reg:R58741
Pontiac Correctional Center
700 w. Lincoln Av. Box 99
Pontiac, IL 61764
Dated: ~~April 27, 2011~~
June 7, 2011

Sworn to before me this

8th day of June, 2011

Paula G. Rich
Notary Public